

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN THE MATTER OF)
THE EXTRADITION OF) No. 24-mj-01365-DLC
T.C.)

GOVERNMENT'S ASSENTED-TO MOTION TO SEAL

Pursuant to Local Rule 7.2, the United States of America respectfully requests to file its response to the Court's sealed Order (Dkt. 108), partially under seal, with a redacted version on the public docket. As grounds therefore, the government states that certain portions of the government's response discuss confidential medical information of T.C. Medical information is "universally assumed to be private, not public." *United States v. Kravetz*, 706 F.3d 47, 59, 63 (1st Cir. 2013) (quoting *In re Boston Herald, Inc.*, 321 F.3d 174, 190 (1st Cir. 2003)). Additionally, T.C. has raised a concern that a public discussion of his conditions of confinement may potentially jeopardize his safety and security at his current facility. Accordingly, the government proposes to redact this information as well.

The United States further moves, pursuant to General Order 06-05, that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents that the United States has filed in this matter.

Counsel for T.C. assents to this motion.

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

Date: August 22, 2024

By: /s/ Kristen A. Kearney
KRISTEN A. KEARNEY
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Kristen A. Kearney
KRISTEN A. KEARNEY
Assistant U.S. Attorney